

Edward D. Lodgen, Bar No. 155168  
 Julia V. Lee, Bar No. 252417  
 ROBINS, KAPLAN, MILLER & CIRESI L.L.P.  
 2049 Century Park East, Suite 3400  
 Los Angeles, CA 90067-3208  
 Telephone: 310-552-0130  
 Facsimile: 310-229-5800

Christopher W. Madel, MN Reg. No. 230297  
 Jennifer M. Robbins, MN Reg. No. 387745  
 ROBINS, KAPLAN, MILLER & CIRESI L.L.P.  
 800 LaSalle Avenue  
 2800 LaSalle Plaza  
 Minneapolis, MN 55402-2015  
 Telephone: 612-349-8500  
 Facsimile: 612-339-4181

*Attorneys for Defendant Portfolio Recovery  
 Associates, LLC*

**UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF CALIFORNIA**

**IN RE: PORTFOLIO RECOVERY  
 ASSOCIATES, LLC, TELEPHONE  
 CONSUMER PROTECTION ACT  
 LITIGATION**

Case No. 3:11-md-02295-JAH(BGS)

Hon. John A. Houston  
 Hon. Bernard G. Skomal

**STIPULATION OF DISMISSAL WITH  
 PREJUDICE**

JODY FIRNENO,

Plaintiff,

THIS DOCUMENT RELATES TO:

Case No. 3:14-cv-1401-JAH(BGS)

vs.

CREDIT COLLECTION SERVICES,  
 INC., et al.,

Defendant.

**IT IS HEREBY STIPULATED AND AGREED**, by and between the parties to the member case *Jody Firneno v. Credit Collection Services, Inc., et al.*, 3:14-cv-1401-JAH-BGS (“the *Firneno* action”), namely Plaintiff Jody Firneno and Defendant Portfolio Recovery Associates, LLC, through their respective counsel, that the *Firneno* action, including all claims and counterclaims that were or might have been asserted in the

*Firreno* action, may be and hereby are dismissed, pursuant to the parties' settlement agreement and to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), with prejudice and with each party to bear its own costs and attorneys' fees.

The parties to the *Firreno* action respectfully request the Court to terminate the *Firreno* action by valid order pursuant to this Stipulation of Dismissal and to direct the Clerk of this Court to transmit a copy of the same to the Clerk of the United States Judicial Panel on Multidistrict Litigation. *See* J.P.M.L. Rule 10.1 ("Where the transferee district court terminates an action by valid order, including but not limited to summary judgment, judgment of dismissal and judgment upon stipulation, the transferee district court clerk shall transmit a copy of that order to the Clerk of the Panel. The terminated action shall not be remanded to the transferor court and the transferee court shall retain the original files and records unless the transferee judge or the Panel directs otherwise.").

Stipulated To By:

June 30, 2014

By: s/by consent Ian B. Lyngklip (P47173)

Attorney for Plaintiff  
Lyngklip & Associates Consumer Law Center, PLC  
Southfield, MI 48075  
Telephone: 248-208-8864  
[ian@MichiganConsumerLaw.com](mailto:ian@MichiganConsumerLaw.com)

*Attorney for Plaintiff Jody Firreno*

June 30, 2014

By: s/Jennifer M. Robbins MN #387745

Christopher W. Madel, MN Reg. No. 230297  
Jennifer M. Robbins, MN Reg. No. 387745  
ROBINS, KAPLAN, MILLER & CIRESI, LLP  
800 LaSalle Avenue  
2800 LaSalle Plaza  
Minneapolis, MN 55402-2015  
Telephone: 612-349-8500  
Facsimile: 612-339-4181

Edward D. Lodgen, Bar No. 155168  
Julia V. Lee, Bar No. 252417  
ROBINS, KAPLAN, MILLER & CIRESI, LLP  
2049 Century Park East, Suite 3400  
Los Angeles, CA 90067-3208  
Telephone: 310-552-0130  
Facsimile: 310-229-5800

*Attorneys for Portfolio Recovery Associates, LLC*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28